REMARKS

Claims 1-38 are present in this application, all of which are rejected.

Claim 1 has been amended to avoid the objection.

Claims 1-3, 7-8, 11-14, 18, 22-24, 29-30, 32-34, 36 and 38 are rejected under 35 U.S.C. 103(a) as being unpatentable over Juitt et al. (U.S. 7042988) in view of Doshi et al. (U.S. 6130875).

The Examiner has rejected the independent claim 1, relying on Juitt to teach all limitations except the integration of a centralized infrastructure into a distributed authentication infrastructure and relied on Doshi to cure this omission.

The rejection is not well taken.

The allegation that Juitt teaches "a centralized authentication infrastructure integrated into said distributed authentication infrastructure and including a central server" (last two lines on page two of the Office Action) is in contradiction to the admission that "Juitt does not explicitly disclose a centralized infrastructure integrated into said distributed authentication infrastructure" (first sentence of the first complete paragraph on page 3 of the Office Action). It is the applicant's position that the teaching of such integrated infrastructure is not provided by Juitt.

It is also the applicants' opinion that there is no teaching in Juitt that "said distributed authentication infrastructure is initially implemented and said centralized authentication infrastructure is later integrated into said distributed authenticated infrastructure."

While alleging the disclosure of a plurality of nodes, the Examiner referred to Juitt, Figure 1A items 102a-c as the equivalent of the nodes. The items 102a-c in Figure

1A of Juitt are clearly recited as access points which provide wireless access to the corporate intranet 110 via the wireless network 105 (column 6, lines 63-65). Nowhere in Juitt was any teaching that these access points are in communication with each other or can verify the identification of the plurality of the access points, as required by the claim 1.

While alleging the teaching of "a centralized authentication infrastructure integrated into said distributed authentication infrastructure and including a central server, said central server being coupled to said plurality of nodes and being utilized for verifying said identification of said plurality of nodes", the Examiner referred to Figure 1A item 117 of Juitt. Item 117 of Figure 1A in Juitt is clearly defined as the wired network. The access points, as argued above, should not be read as nodes. Therefore, item 117 of Juitt or the central server contained therein cannot be read to be coupled to a plurality of nodes.

Therefore, it is the applicants' position that Juitt fails to teach each and every limitation alleged by the Examiner and Doshi fails to cure the deficiency. Rejection of claim 1 should be withdrawn.

Claims 2, 3, 7, 8, 11-14, 18, 22, 32-34 and 38 depend either directly or indirectly from claim 1 and rejections thereof should be withdrawn.

In particular, with respect to claims 7 and 11, the Examiner relied on Figure 1A to disclose that said central server is said new entity. The applicants disagree. There is no teaching in Juitt, either in the drawing or the specification, that the Authentication Server 125 in Juitt can be treated as a new entity to be authenticated.

With respect to claim 8, the Examiner relied on column 3, lines 50-61 in Juitt to teach a quorum of said plurality of nodes. It is the applicants' position that the cited lines are irrelevant to the teaching of a quorum of said plurality of nodes.

With respect to claim 12, the Examiner relied on column 3 lines 50-61, column 12 lines 61-67 and column 13 lines 1-12 of Juitt to teach "said central server is coupled to a new entity and is utilized for verifying the identification of said new entity and enrolling said new entity to the hybrid authentication system, said central server producing a log for recording a plurality of failed authentications and a plurality of failed enrollments by said plurality of nodes." The applicants respectfully disagree. The cited lines are concerned with gateway server 120, rather than the central server 125 of Juitt. Further, no log of <u>failed</u> authentications and enrollments are taught.

With respect to claim 13, Juitt, particularly column 16 lines 37-57 and column 3 lines 50-61 are relied on as teaching "said central server is coupled to said plurality of nodes for at least one of issuing a global directive thereto and bolstering said plurality of nodes by assisting with at least one of an enrollment task, an authentication task and a permission granting task." The applicants respectfully disagree. Column 16 lines 37-57 is concerned about inherited role, which allows limited access even if the elements in the policies do not match the requested service. Column 3 lines 50-61 is concerned with gateway, not the central server. No teaching of the quoted limitation is provided by the cited lines of Juitt.

With respect to claims 18 and 22, it is the applicants' position that figure 2 of Juitt fails to teach any nodes or the steps as claimed involving second node and trusted third party node. Figure 2 is irrelevant to the teaching of claims 18 and 22.

Claim 23, 24 and 29 are independent claims. The Examiner has made it clear that claims 23, 24 and 29 have similar limitations as those of claim 1 thus rejected with the same rationale applied against claim 1. The applicants' hereby incorporate by reference all the arguments provided for claim 1 and hold the position that the rejection of claims 23, 24 and 29 are similarly improper and should be withdrawn.

Claim 30 and 31 depend directly or indirectly from claim 29. Therefore, rejection thereof should be withdrawn.

In particular, regarding claim 30, the Examiner relied on column 3 lines 50-61, column 12 lines 61-67 and column 13 lines 1-12 of Juitt to allegedly teach "said central server is coupled to said plurality of nodes for at least one of issuing a global directive thereto and supporting said plurality of nodes by assisting with at least one of an enrollment task, an authentication task and a permission granting task." The applicants respectfully disagree. All the cited lines in Juitt are related to gateway server 120, rather than said central server 125 or any function thereof.

Claims 4-6, 9-10, 15-17, 19-21, 25-28, 35 and 37 are rejected under 35 U.S.C. 103(a) as being unpatentable over Juitt in view of Doshi, further in view of Benantar (U.S. 2003/0130947).

Regarding claim 4, the Examiner relied on Juitt and Doshi to teach all of the limitations of claim 4, which indirectly depends from claim 1, except that said verifying node signs a certificate related to said new entity, and relied on Ben to cure the omission.

As argued above with respect to claim 1, Juitt and Doshi fail to teach all of the alleged claim limitations. Ben fails to cure this deficiency. Therefore, the rejection of claim 4 should be withdrawn.

By way of similar arguments, it is the applicants' position that Juitt and Doshi fail to teach all of the limitations of the respective independent claims from which claims 5, 6, 9-10, 15-17, 19-21, 25-28, 35 and 37 depend either directly or indirectly.

Rejections of claims 4-6, 9-10, 15-17, 19-21, 25-28, 35 and 37 should be withdrawn.

SUMMARY

It is submitted that the application is in condition for allowance and notification thereof is respectfully requested.

Respectfully Submitted,
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